

JENNIFER LIU (SBN 279370)
E-mail: jliu@liulawpc.com
REBECCA PETERSON-FISHER (SBN 255359)
E-mail: rpetersonfisher@liulawpc.com
THE LIU LAW FIRM, P.C.
800 Menlo Avenue, Suite 102
Menlo Park, CA 94025
Telephone: (650) 461-9000
Facsimile: (650) 460-6967

ALISON KOSINSKI (SBN 261676)
E-Mail: alison@ktlawsf.com
EMILY THIAGARAJ (SBN 284634)
E-Mail: emily@ktlawsf.com
KOSINSKI & THIAGARAJ, LLP
201 Filbert Street, Suite 201
San Francisco, CA 94133
Telephone: (415) 230-2860
Facsimile: (415) 723-7099

Attorneys for Plaintiffs and the Putative Class and Collective

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KAYLA GORDON and JAMES MOLLO,

Plaintiffs,

v.

BRAAVOS, INC., d/b/a BANNERMAN
SECURITY; JONATHAN CHIN; and DOES
1 through 10, Inclusive,

Defendants.

**STIPULATION AND ~~PROPOSED~~
ORDER TO DISMISS CASE**

Compl. Filed: Oct. 31, 2017

The Honorable William Alsup

Date: November 1, 2018

Time: 8:00 a.m.

Place: Courtroom 12
450 Golden Gate Avenue
San Francisco, California

1 TO THE COURT, ALL PARTIES, AND COUNSEL:

2 WHEREAS, Defendants filed a Motion to Stay the Case, or, in the Alternative, Stay the
3 California Claims, on July 23, 2018, which was scheduled to be heard on September 6, 2018;

4 WHEREAS, Plaintiffs filed a Motion to File First Amended Complaint seeking to add
5 Matthew Voska and Antoine de Chevigne as individual defendants, which was also scheduled to
6 be heard on September 6, 2018;

7 WHEREAS, due to their stipulation to the filing of a Second Amended Complaint in
8 *Gary Houston v. Braavos, Inc.*, San Francisco Superior Court No. CGC-17-562019 ("*Houston*"),
9 that would render the parties and claims in *Houston* co-extensive with the parties and claims in
10 this matter, the parties filed a Stipulation to Continue September 6, 2018 Hearings on
11 Defendants' Motion to Stay the Case, or, in the Alternative, to Stay the California Claims and
12 Plaintiffs' Motion to File First Amended Complaint;

13 WHEREAS, the Court granted the parties' stipulation on September 5, 2018 and
14 continued the hearings to November 1, 2018 to enable the Honorable Mary Wiss of the San
15 Francisco Superior Court to consider the parties' Stipulation and [Proposed] Order for Leave to
16 File Second Amended Complaint in *Houston*;

17 WHEREAS, Judge Wiss approved the parties' stipulation and ordered the plaintiffs in
18 that action to file their Second Amended Complaint by October 22, 2018;

19 WHEREAS, the *Houston* plaintiffs filed their Second Amended Complaint on October
20 19, 2018;

21 WHEREAS, Plaintiffs Gordon and Mollo are now plaintiffs in *Houston*, and Defendant
22 Chin (and proposed defendants Matthew Voska and Antoine de Chevigne) are now named
23 defendants in *Houston*, all claims asserted in this action are now asserted in *Houston*, and
24 Plaintiffs' counsel in this matter are now co-counsel with Plaintiff Houston's counsel,

25
26
27 //

1 IT IS HEREBY STIPULATED by and between Plaintiffs and Defendants through their
2 counsel that:

- 3 1. Plaintiffs voluntarily dismiss this case.
4 2. The dismissal shall be without prejudice
5 3. The parties shall bear their own costs.

6
7 IT IS SO STIPULATED.

8
9 DATED: October 24, 2018

THE LIU LAW FIRM, P.C.

10 By: /s/ Rebecca Peterson-Fisher

11 Rebecca Peterson-Fisher

Jennifer L. Liu

THE LIU LAW FIRM, P.C.

800 Menlo Avenue, Suite 102

Menlo Park, CA 94025

Telephone: (650) 461-9000

Facsimile: (650) 460-6967

Emily Thiagaraj

Alison Kosinski

KOSINSKI & THIAGARAJ, LLP

201 Filbert Street, Suite 201

San Francisco, CA 94133

Telephone: (415) 230-2860

Facsimile: (415) 723-7099

*Attorneys for Plaintiffs and the Putative Class and
Collective*

19
20 DATED: October 24, 2018

LAW OFFICE OF JEROME SCHREIBSTEIN

21
22 By: /s/ Jerome Schreibstein

Jerome Schreibstein (SBN 154051)

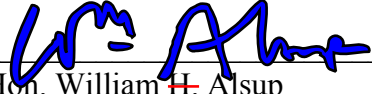
23 Attorneys for Defendant BRAAVOS, INC
24
25
26
27
28

1 The Court having considered the stipulation of the parties, and good cause appearing
2 therefor, orders as follows:

- 3 1. The case is dismissed without prejudice.
4 2. The parties shall bear their own costs.
5

6 IT IS SO ORDERED.

7
8 Dated: October 25, 2018.



Hon. William H. Alsup
United States District Judge
Northern District of California